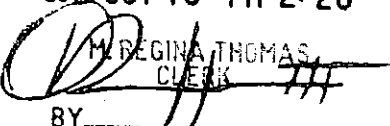


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U.S. BANKRUPTCY COURT
NORTHERN DISTRICT
OF GEORGIA

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

2018 OCT 15 PM 2:26


BY M. REGINA THOMAS
CLERK
DEPUTY CLERK

) CHAPTER 7
In re:)
CASSANDRA JOHNSON LANDRY)
Debtor) Case No. 18-55697-lrc

Motion For the
**NOTICE OF REMOVAL OF THE]
CHAPTER 7 BANKRUPTCY TRUSTEE**

COMES NOW, CASSANDRA JOHNSON LANDRY, Debtor files this MOTION
FOR NOTICE AND HEARING FOR REMOVAL OF THE CHAPTER 7
BANKRUPTCY TRUSTEE pursuant to Title 11 Section 324 of the Bankruptcy
Code for the following reasons:

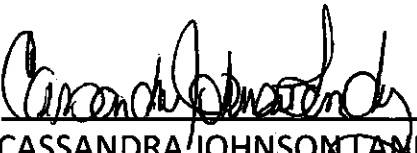
1. Title 11 Section 324 states that
 - (a) The court, after and a hearing , may remove a trustee, other than the United States Trustee or a examiner, for cause
 - (b) Whenever the court removes a trustee or examiner under subsection (a) if a case under this title, such trustee or examiner shall be removed in all other cases under this title in which such trustee or examiner is then serving unless the court orders otherwise
2. The removal of the Standing Chapter 7 Trustee, Robert Trauner is proper due to a conflict of interest that exists with the execution of duties of the Chapter 7 trustee in terms of the following:

1. Trustee appears to have a relationship with the state's previous attorney general via special project at the time of the initial Lawsuit Filing by Plaintiff's agency.
2. Trustee current bar status is Emeritus which means his bar membership fees are waived, however he can not practice law per Georgia's bar guidelines.
3. Trustee had a previous working relationship with CACH LLC. who represented On Deck Funding, which is listed account on current bankruptcy.

The Bankruptcy Appellate Panel in *Morgan v. Goldman* (In re Morgan), 375 B.R. 838 (B.A.P. 8th Cir. 2007) and the U.S. Court of Appeals for the Eleventh Circuit in *Walden v. Walker* (In re Walker), 515 F.3d 1204 (11th Cir. 2008) both concluded that a bankruptcy judge has the ability to remove a trustee “for cause,” sua sponte, after “notice and a hearing.”

WHEREFORE, The Debtor respectfully files this court for Notice and Hearing and Removal of the Standing Chapter 7 Bankruptcy Trustee in this case.

Respectfully Submitted

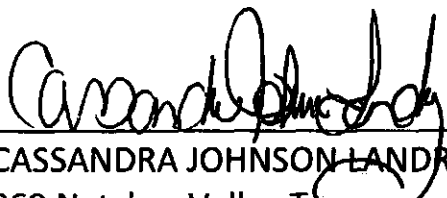
By: 
CASSANDRA JOHNSON LANDRY
869 Natchez Valley Trace
Grayson, Georgia 30331
678-860-3621

CERTIFICATE OF SERVICE

We have mailed NOTICE OF HEARING FOR THE REMOVAL OF TO CHAPTER 7
BANKRUPTCY TRUSTEE to the following Parties by way of the United States
Postal Service via First Class Mail:

ROBERT TRAUNER
P.O. BOX. 421025
ATLANTA, GEORGIA 30328-0825
(404)520-1496

Respectfully submitted this 15th day October 2018.

By: 
CASSANDRA JOHNSON LANDRY
869 Natchez Valley Trace
Grayson, Georgia 30017
678-860-3621